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I that the topic of the need
iently came up, and I am just

s, whether there were any
iency problems that were

ncy problems, but the range of

We gut manpower or hours behind

- 3 A. Other than what I have already told you, I have
- 4 no other information.
- Q. At this time, I take it what you were trying to
- 6 do is get up to speed on what was in place so you could
- 7 figure out what to do about it. Is that generally an
- 8 accurate assessment?
- 9 A. I would characterize it as basically an
- 10 educational tutorial session, just kind of learning how
- 11 things get done, who does them, and how the basic business
- 12 works.
- 13 Q. And what was the time period over which that
- 14 process occurred? How long until you felt that you knew
- 15 enough about what was going on to start figuring out what
- 16 changes to put in place?
- 17 A. I would say I started feeling more comfortable
- 18 about knowing the lay of the land in the early to
- 19 mid-February time frame, but even to this day, there are
- 20 still areas that I need to refer to others for counsel and
- 21 education. It's kind of a subjective assessment, I guess.
- 22 Q. Now, when you started in your position on
- 23 January 16th, were you there as an apprentice or had the
- 24 reins been handed to you, you headed things up?
- A. I think, in any time I have made a switch in my 0058
- 1 career, there is kind of what's official in the
- 2 organization chart, and what you can fix or are capable of
- 3 making the fundamental decisions and offering the
- 4 direction.
- 5 Jerry and I worked, and still do to this day,

- 8 Q. And who did you meet with first?
- 9 A. I don't recall.
- 10 Q. Did you have a meeting with Don Griffin?
- 11 A. Yes, I did.
- 12 Q. And at the time, he was in charge of daily
- 13 operations at the LISC?
- 14 A. Yes, he was.
- 15 Q. Had he recently assumed that role?
- 16 A. My understanding was that he had recently
- 17 assumed it, yes.
- 18 Q. And what did you and Mr. Griffin discuss in your
- 19 meeting?
- 20 A. We had a general discussion, kind of what my
- 21 operating style is, what my expectations would be of him
- 22 working for me, what his expectations would be of me
- 23 working for -- me working for him and as an employee of
- 24 mine. We talked about what the current state of affairs
- $25\,$ were, his assessment of the LISC, what his major areas of $0060\,$
- 1 focus were.
- We talked about some administrative items, like
- 3 setting up meetings with his management team to introduce
- 4 myself, get to know them, then hear what's on their mind.
- 5 That's the best of my recollection of what we discussed.
- 6 Q. Let me take a step back. When did the meeting
- 7 occur?
- 8 A. I don't know exactly when it occurred,
- 9 approximately, you know, sometime during that first week,
- 10 week-and-a-half that I was on the job.

be somewhere between January 16th, it wo th or so? th, approximately. w long did it last? ink they were scheduled for about two hours. ran short or long, my recollection with Don is ve gone a little bit over two hours. o was present? and him. en you say you had discussions about the e of affairs, what did you discuss on that 1arily on production capacity, how many com' in, how many they were processing on a where the shortfall was, what were things ght I was going to do to try to improve that. t did he tell you concerning the amount of /ere coming in? they were more than what he was putting hat difference? 't recall the exact number, but I think we you know -- at that point in time, on a , a couple of hundred a week difference at was coming in versus what our production at the time, was your capacity still in the

- 16 little bit about what systems issues there were in terms
- 17 of support or lack of support, and, you know, where he
- 18 felt there was opportunity to explore.
- 19 Q. Did he indicate whether he thought it was a
- 20 force problem, i.e., not enough people, or a systems
- 21 problem, or an efficiency problem, or a combination?
- 22 A. I think we hit all angles, I mean, and to this
- 23 day, we still have various we have opportunity in all
- 24 those areas. So I think we had discussion in all three of
- 25 the areas.

0063

- 1 Q. As of the time of your meeting with Mr. Griffin,
- 2 were you still operating with the staff that included a
- 3 contract employee component and a borrowed employee
- 4 component?
- 5 A. Yes.
- 6 Q. And the ratios, whatever they were, is that
- 7 basically the same as when you started, had there been any
- 8 change?
- 9 A. I wouldn't think that there was an appreciable
- 10 change, especially in the productive resource. As I
- 11 mentioned earlier, we were on kind of a mass hiring mode,
- 12 so there may have been a number of people presently hired
- 13 in the few weeks that -- or people that would immediately
- 14 move into training.
- 15 And so there may have been a larger number of
- 16 people in the payroll, but I don't know that there was a
- 17 larger number of people productive in the workload.

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ou and Mr. Griffin
you can recall?
about his tenure in
was, what he had desires
ing forward.
on the job, how long
operating the LISC as of
my understanding is
me in the December time
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four to six weeks,
-
one-on-one meetings,
Sam Tenerelli?
occur?
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ing last?
probably scheduled for
nder two hours.
at the meeting?
n discuss during that

- We talked about the metrics and results that
- 24 were available from a maintenance perspective. We talked
- 25 a little bit about what the systems plans and support were 0066
- 1 for his work operation. Went through kind of a staffing
- 2 profile of his organization around the management ranks.
- 3 Q. You used the phrase metrics, what do you mean by
- 4 metrics?
- 5 A. Operating results measures of how the
- 6 organization is performing.
- Q. What was his assessment of, in general terms, of
- 8 how the ISC was performing as of that time?
- 9 A. I walked away with a sense that we were very
- 10 much functioning in a parity range of what our current
- 11 operations in the retail side were.
- 12 Q. Parity, that is a way of saying that you were
- 13 providing as good a service for the Competitive Local
- 14 Carriers through the ISC as you were providing for -- you,
- 15 Pacific was providing for its own customers through other
- 16 divisions?
- 17 A. Yeah. Metric for duration, how long it takes to
- 18 resolve a customer's problem, that we were operating in
- 19 similar fashion as we were with the retail side of the
- 20 business.
- Q. What's your understanding of the significance of
- 22 parity? Is that a goal for Pacific, to achieve parity in
- 23 terms of providing service to Competitive Local Carrier
- 24 customers and its business and residential customers?
- 25 MR. KOLTO-WININGER: I will object to the extent

0067

- l . . . ls for a legal conclusion, but go ahead and answer.
- 2 THE WITNESS: In the nonrealistic sense, I'd say
- 3 that is the goal, relative to how we want to run our
- 4 operations.
- 5 MR. PUDDY: Q. So, for example, your goal for
- 6 operating the LISC, you want to provide levels of service
- 7 for the company -- different local carrier customers that
- 8 are on parity with the levels of services that Pacific
- 9 provides to its own end-user customers?
- 10 MR. KOLTO-WININGER: Same objection. Go ahead
- 11 and answer.
- 12 THE WITNESS: Yes.
- MR. PUDDY: Q. How did you arrive at that goal?
- 1 MR. KOLTO-WININGER: Same objection. But go
 - 15 ahead and answer.
- 16 THE WITNESS: I didn't arrive at the goal.
- 17 MR. PUDDY: Q. Who did?
- 18 A. I don't know.
- 19 Q. Who told you about it?
- 20 A. Well, I remember reading about it once in the
- 21 company brochure even before I came to the job. Relative
- 22 to how it impacts our contracts, I think Jerry was
- 23 probably -- Jerry Sinn was probably the most -- provided
- 24 me the most information about it.
- 25 Q. So when you took over as vice president for 0068
- 1 resale operations -- or after you took over, were you ever
 - expressly advised that the goal for LISC operation was to

- 8 Q. She is responsible for the development of
- 9 methods for changing the process out, basically?
- 10 A. Yes, that is her primary area of emphasis.
- 11 Q. And what projects were ongoing at that time?
- 12 A. Many projects were ongoing at that time and are
- 13 still ongoing today. Each product has a responsibility or
- 14 has to have methods and procedures developed for it, so a
- 15 product could be a customer calling feature, it could be a
- 16 typical type of a directory listing, it could be a basic
- 17 access line versus a Centrex access line.
- 18 And she has people who are responsible across
- 19 the broad spectrum of products that we offer, writing
- 20 methods and procedures and constantly responding to
- 21 changes in those.
- 22 So an example could be, on any given day, if the
- 23 Commission implements a rate change, that rate change
- 24 ultimately flows into the resale market, and methods have
- 25 to be revised and updated to reflect the rate changes and
- 1 to understand other impacts to the order formats, et
- 2 cetera. Because of that, her group, on any given day,
- 3 could have a different set of projects that pop up as a
- 4 result of the volatility of the environment.
- 5 Q. Were there any projections of a more macro level
- 6 that were ongoing, relating to the basic change in the
- 7 overall systems through which the LISC operated?
- 8 A. Yes. She was involved, at that point in time,
- 9 with two major releases that I was aware of or recall.
- 10 One of them was referred to as the RMI-1.5 release, and

- 11 the RMI-3.0 release. RMI stand for Resale Mechanized
- 12 Interface.
- 13 Q. The acronym you gave us here, does that relate
- 14 to NDM or --
- 15 MR. KOLTO-WININGER: EDI.
- 16 MR. PUDDY: Q. EDI, thank you, or neither or
- 17 both?
- 18 A. Yes and no.
- 19 Q. Although I think the record is abundantly clear,
- 20 could you clarify, please?
- 21 A. RMI is the processing logic that sits behind
- 22 NDM, so NDM is a transport vehicle by way that a CLC sends
- 23 us information. We transport it in via an interface
- 24 called NDM. RMI is the logic that sits behind that, that
- 25 then takes that information and chunks it out and 0072
- 1 processes it among multiple subsystems within Pacific
- 2 Bell. EDI is a transport and interface standard. It does
- 3 not necessarily mean a specific systems release, et
- 4 cetera.
- 5 Generally, within the context of how EDI is used
- 6 in the industry, it is a set of industry standards of
- 7 which people intend to, at some point, conform to. It is
- 8 a transport standard that is different than the current
- 9 NDM transport standard, which is a customized proprietary
- 10 interface for resale operations within the California
- 11 territory at Pacific. Ultimately, EDI will have more
- 12 global national standards of which will, at some point,

- 13 supplant NDM with EDI.
- 14 Q. In your conversation with Ms. Wood, did she
- 15 advise you of any ongoing problems relating to LISC
- 16 operations?
- 17 A. Not specifically to LISC operations, no.
- 18 Q. On a more general basis, did she make you aware
- 19 of any problems?
- 20 A. Like virtually everybody involved with these
- 21 major change efforts, she had more work than, you know,
- 22 people that she could reasonably throw out, and we talked
- 23 about prioritization of her workload.
- 24 Q. Did she report that the workload issue had
- 25 resulted in any problems in terms of LISC operations? 0073
- 1 A. We talked about various methods and standards
- 2 that were either queued up to be delivered at a specific
- 3 day or were behind schedule by days or weeks, and when we
- 4 thought we could get that worked out.
- 5 Q. And the releases that you are talking about, are
- 6 those RMI releases or other projects of a different
- 7 nature?
- 8 A. I don't understand your question.
- 9 MR. PUDDY: Can I hear his last answer before
- 10 the one "I do not understand your question?"
- 11 (Record read.)
- 12 MR. PUDDY: Q. Could you elaborate, please, on
- 13 what you meant by the phrase, methods and standards, as
- 14 you used it in your prior answer?
- 15 A. As I addressed earlier, a method or procedure

- 16 would be some kind of a job aide, or document, or
- 17 procedure manual that tells a service rep or a manager how
- 18 to transact a specific set of business transactions.
- 19 Q. Did you arrange a one-on-one meeting with
- 20 Harriet Derosset?
- 21 A. Harriet was not on the payroll at that point in
- 22 time. When she did come on the payroll, I arranged a
- 23 meeting shortly after that.
- 24 Q. At the time that you started, was there anyone
- 25 in the payroll responsible for hiring, recruiting and 0074
- 1 training for the LISC?
- A. There were people who had responsibility for
- 3 doing that type of thing, but they were not directly
- 4 reporting to me, and it was not their sole purpose or
- 5 function in life.
- 6 Q. Did you meet with them on topics of hiring,
- 7 recruiting, training for the LISC?
- 8 A. I received most of my information on that
- 9 subject through Don.
- 10 Q. When did you finally succeed in meeting with
- 11 Harriet Derosset?
- 12 A. It would have been sometime during the first
- 13 week of February.
- 14 Q. How long did that meeting last?
- 15 A. Generally, it would have followed the pattern of
- 16 the previous meetings. I suspect it was about two hours.
- 17 Q. Who else was present?

- 18 A. Harriet and I.
- 19 Q. What did the two of you discuss?
- 20 A. Since Harriet had just come on board, I outlined
- 21 for her what my expectations in putting the role in place
- 22 were. I laid out a couple of immediate do-its that I
- 23 needed her to work on, and kind of outlined the focus of
- 24 what her assignment would be during the course of her
- 25 tenure with us.

0075

- 1 And that was specifically, to focus on getting
- 2 the staffing plan nailed down for the LISC, working with
- 3 our employment organization to build the recruiting plan
- 4 for that, making sure that the training capacity and
- 5 training department was ready to receive the intake of
- 6 employees, and working to ensure that those employees,
- 7 once they were trained, had a place to sit and perform
- 8 their job function. And she would work with our real
- 9 estate organization to ensure that that was going to take
- 10 place.
- 11 Q. By the time that meeting occurred, did you have
- 12 a good handle on what the existing employment situation
- 13 was, number of personnel, employees, borrowed employees,
- 14 contract employees, for example?
- 15 A. I had a better understanding of it, yes.
- 16 Q. What was the situation?
- 17 A. At that point in time, in rough order of
- 18 speaking, we either had hired or had anticipated hiring in
- 19 the next few weeks about 230, give or take a few bodies,
- 20 service representatives and order writers in San

- 21 Francisco. We had 30 to 40 contract employees working for
- 22 us, and as I mentioned earlier, depending on the day of
- 23 the week, anywhere from probably 1 to 400 loaned employees
- 24 for any number of hours on a given day.
- 25 Q. The 230, were those the full-time employees that 0076
- 1 were in place in San Francisco?
- 2 A. They were full-time employees that were either
- 3 on the payroll or very close to being on the payroll. It
- 4 does not necessarily mean they were sitting at a desk,
- 5 productive.
- 6 Q. How many full-time employees did you have
- 7 sitting at the desk, productive, i.e., on the payroll and
- 8 not in training?
- 9 A. I don't recall exactly, but I know that the
- 10 number was less than a hundred.
- 11 Q. Did you have, at that time, an immediate hiring
- 12 goal? You had 230 permanent employees. Were you still on
- 13 a hiring phase at that point?
- 14 A. For the 230 employees?
- 15 Q. You said you had 230. Were you still trying to
- 16 hire more?
- 17 A. Yes.
- 18 Q. So how many were you trying to hire, as a total?
- 19 A. That's really why I was bringing Harriet in was
- 20 to kind of get her around that and understanding exactly
- 21 where we wanted to go and in what time frame. So I would
- 22 say we didn't have a precise direction at that point in

- 23 time.
- Q. So you are hiring people based on as fast as you
- $25\,$ can get them in, but you didn't know when you were going $0077\,$

0078 1 AFTERNOON SESSION 1:00 P.M.
2
3 EXAMINATION BY MR. PUDDY (RESUMED)
4 MR. PUDDY: Q. We were discussing your
5 one-on-one meeting with Harriet Derosset, and we had
6 discussed your discussion of the status of what was in
7 place and that there was, correct me if I'm wrong, there
8 was no discussion during that one-on-one meeting as to
9 what the hiring goals would be?
10 A. Well, in broad terms, we discussed goals around
11 getting a hiring plan in place, closing on the numbers by
12 work location, the mix of titles, the time frame under
13 which we could do the intake, get them trained, et cetera,
14 so there was discussion around that, but we were not at
15 that point closed on the number is this by this month.
16 Q. Did you discuss the process by which the hiring
17 goals would be implemented?
18 A. We discussed what members of the team needed to
19 participate in the work to ultimately arrive at those
20 conclusions.
Q. Who was necessary to have participated in that?
A. I was responsible for building the ultimate
23 model that was used, that kind of laid out the force plan,
24 and what I would do is seek input from each of my
25 functional organizations around different parameters that 0079
I would go into the models of Don Griffin, and members of
2 his team might be responsible for certain inputs to the

- 3 model. Harriet would have information on other issues. I
- 4 would work with Jaime Villagomez' organization relative to
- 5 some assumptions and information on that as well.
- 6 Q. Mr. Villagomez' organization is what?
- 7 A. Finance and planning for -- Villagomez,
- 8 V-i-l-l-a-g-o-m-e-z. Mr. Villagomez' organization is
- 9 responsible for finance and planning and industry markets.
- 10 Q. As to what issues were you going to colleague
- 11 with Mr. Villagomez?
- 12 A. I was going to what with Mr. Villagomez?
- 13 Q. Colleague, talk, discuss.
- 14 MR. ETTINGER: Is that a verb?
- 15 MR. PUDDY: Q. Coordinate.
- 16 A. I worked with people in his organization to
- 17 build the models. They have model building expertise that
- 18 I could probably do myself, but it's more expedient to
- 19 have them crunch some of the numbers for me.
- 20 Q. What were you planning to use models to project?
- 21 A. You use models for doing basic operation
- 22 planning with, and more importantly, in this particular
- 23 instance, because of requests via proceedings like this,
- 24 we were working back with the legal community on trying to
- 25 have information to give out, as part of these hearings 0080
- 1 and other issues we were doing in the regulatory and legal
- 2 arena, so I needed intelligence on the basis on which to
- 3 make those decisions and advise them with.
- 4 Q. What issues were you going to work with
- 5 Ms. Derosset on?

- 6 A. Harriet, in terms of her support of the model,
- 7 would be things like -- if I hesitate back and say an
- 8 output is X numbers of bodies to handle a certain amount
- 9 of capacity, issues like do we have the training capacity
- 10 to bring that many people through, what's the intake by
- 11 month need to look like, what the requirements that we
- 12 need to put out to the real estate organization so that we
- 13 have seats and terminals.
- 14 Q. With respect to what you were going to work with
- 15 other people in assist you in reaching the final
- 16 decisions, were there other issues?
- 17 A. I am not sure I understand your question.
- 18 Q. You indicated that you were going to work with
- 19 Villagomez with some issues and Harriet with some issues.
- 20 Were there issues that you were working with other people
- 21 on, in order to assist you in making the ultimate
- 22 decisions on the hiring of staff?
- 23 A. Nothing of substance comes to mind. I mean,
- 24 this -- it's a major undertaking to do something like
- 25 this, so I am sure there were periphery or aside 0081
- 1 conversations but I don't recall anything of substance.
- 2 Q. How were you going to determine your output
- 3 goal? Let me withdraw that.
- 4 Wouldn't one of the factors you need to figure
- 5 into your hiring plan the output goal, in terms of
- 6 production?
- 7 A. There is a lot of different ways that you could

- 8 slice it. One way you could slice it is by looking at9 output goal.
- 10 Q. How did you elect to slice it?
- 11 A. We did it a number of different ways. We looked
- 12 at output goals. You have to look at capacity; I mean, to
- 13 build capacity is a factor of a lot of different things.
- 14 Some of it is human resources, some of it is systemic, and
- 15 each one of those dynamics has different points that come
- 16 into place.
- 17 So you can, you know, start with a theoretical
- 18 objective and then understand kind of where your critical
- 19 path or choke points are, or you can say here is where my
- 20 capabilities are in a particular area. And I think we
- 21 kind of went around it in both ways. Here is the
- 22 theoretical goal or objective we might want to get to.
- 23 Here is what a practical goal or objective is, everything
- 24 we know. Now, how do you close gaps between them.
- 25 Q. Basically, the function of the LISC is to 0082
- 1 migrate customers from Pacific Bell to CLEC's, right?
- 2 A. Or from CLEC's back to Pacific Bell, or from one
- 3 CLEC to another CLEC.
- 4 Q. So isn't the basic parameter that you need to
- 5 get a grip on, the number of transfers that were going to
- 6 occur over a given time period?
- 7 A. A forecast of what our resale volumes would be
- 8 for migrations and other types of orders would be one
- 9 parameter that we'd consider, yes.
- 10 Q. And what were you considering to establish that

- 11 parameter for your modeling purposes?
- 12 A. What was I considering?
- 13 Q. Yeah, what forecast?
- 14 A. Forecast that was provided to me by Laura
- 15 Schwartz.
- 16 Q. When were you given that forecast?
- 17 A. Late February, I believe. Exact date, I don't
- 18 know.
- 19 Q. And what did Laura Schwartz' late February
- 20 forecast predict in terms of numbers of resale
- 21 transactions?
- 22 A. I don't know how I can answer that question.
- 23 That doesn't necessarily have a line that says number of
- 24 resale transactions.
- Q. What did the forecast say? 0083
- 1 A. With respect to what? Forecasts -- maybe I can
- 2 describe a forecast for you. A forecast is a cross of
- 3 various products, various services, runs over a period of
- 4 time.
- 5 Q. I am not sure I -- I have seen them in a number
- 6 of different forecasts. Not having seen it, I am just
- 7 asking you what this forecast said. There is no question
- 8 pending. Let me just check my list of documents here.
- 9 Let me show you --
- 10 Let's go off the record for a second.
- 11 (Discussion off the record.)
- MR. PUDDY: Back on the record.

- 13 Q. Let me show you what was previously marked as
- 14 deposition Exhibit 15, and I will just ask if that was the
- 15 forecast by Laura Schwartz that you are referring to in
- 16 your recent testimony.
- 17 A. This looks like raw data that would be used to
- 18 roll up to forecasts. This is not the actual document
- 19 that I would work off of.
- 20 Q. And the actual document that you were working
- 21 off of, does that document still exist?
- 22 A. The spreadsheet that I'd be working off of, I
- 23 would assume it would exist.
- Q. Could you just describe for me what it is that
- 25 Ms. Schwartz supplied to you that you referred to as a 0084
- 1 forecast?
- 2 A. First of all, Ms. Schwartz never actually handed
- 3 anything actually to me, myself. I receive a document
- 4 that has her name at the bottom of it, so I assume she is
- 5 the generator of the document. The documents that I would
- 6 get would be a similar breakdown by month, as this is,
- 7 that would outline the expected number in hundred
- 8 thousands of access lines that would move by these
- 9 products.
- 10 Q. And in terms of total number of transactions, on
- 11 a going forward basis from February '93, what did the
- 12 Schwartz forecasts -- withdraw the question.
- On a going forward basis, from and after
- 14 February 1997, what did Ms. Schwartz' forecasts tell you
- 15 would be -- in terms of total number of lines, that would

- 16 move per month?
- 17 A. For all product sets?
- 18 Q. Yeah.
- 19 A. There is no per-month number. It varies by
- 20 month. I don't know how to answer that question.
- Q. Let's just refer to document Exhibit No. 15 for
- 22 a moment. How does Exhibit 15 differ in terms of format
- 23 from the document that you were using, that is, format or
- 24 information?
- 25 A. I am looking at a document that is marked LISA 0085
- 1 trunks. I am not responsible for LISA trunks, so I
- 2 wouldn't see this particular document. I would be looking
- 3 at resale access line numbers for purposes of migration,
- 4 so that's kind of one major difference. The --
- 5 Q. Looking down on the last line of the Exhibit 15,
- 6 total resale access lines, is that a reference to resale
- 7 access lines or access lines that are trunks?
- 8 MR. KOLTO-WININGER: Objection. Calls for
- 9 speculation, but go ahead, give your answer.
- 10 THE WITNESS: I would assume that this means
- 11 access lines that are LISA trunks. L-I-S-A.
- 12 MR. PUDDY: Q. And so you are looking you
- 13 are interested in resale access lines transactions,
- 14 correct?
- 15 A. Yes.
- 16 Q. And what are the other differences between the
- 17 document you were relying on and Exhibit 15, in terms of

- 18 format?
- 19 A. Well, the format that I usually receive is an
- 20 Excel spreadsheet, which I don't know that the data is any
- 21 different on this. But the format, in terms of how it is
- 22 laid out within cells in the spreadsheet, it isn't
- 23 apparent that this is what this is, an output from --
- 24 Q. Did you receive any other forecast information,
- 25 other than the document we have been discussing, that 0086
- 1 factored into an initial decision on employment needs?
- 2 A. The staffing numbers were built off of the
- 3 official forecast, the official forecast that Laura
- 4 provided.
- 5 Q. And do you know the date of that forecast?
- 6 A. I don't know the precise date, but the date,
- 7 revision date on the spreadsheet I was working on was
- 8 within a week of the February time frame that I received
- 9 it.
- 10 Q. And based upon that and the other input factors,
- 11 did you determine the total staffing level that you needed
- 12 for the LISC, in order to meet the projections -- let me
- 13 withdraw that.
- 14 Having received that information, did you
- 15 thereupon set out to determine what the total staffing
- 16 level would have to be in order to meet those projections?
- 17 A. Yes.
- 18 Q. Was it your goal to meet the projections, or to
- 19 exceed them by some -- to create capacity that would
- 20 exceed the projections, or what?

- 21 A. Our goal is to meet the projections within all
- 22 the other variables and the context that I provided you
- 23 with earlier, which is what are the other constraints and
- 24 issues that come in in trying to achieve that goal and
- 25 objective. It's not a simple kind of a digital generic 0087
- 1 on, off. There is a lot of other dynamics that come in,
- 2 but the goal is to meet the projection.
- 3 Q. So from your standpoint, you were trying to meet
- 4 Pacific's official forecast of capacity needs for the
- 5 LISC?
- 6 A. That's correct.
- Q. Do you know if Pacific had ever succeeded in
- 8 meeting its official forecasts prior to your arrival?
- 9 A. I don't know.
- 10 Q. Do you know if Pacific had even attempted to
- 11 meet its official forecasts prior to your arrival?
- 12 A. I don't know. I would assume so.
- 13 Q. Did you set up a one-on-one meeting in late
- 14 January '97 with Joy Norton?
- 15 A. Joy just started work this week.
- 16 Q. So you didn't?
- 17 A. No.
- 18 Q. Is there anyone else with whom you set up a
- 19 one-on-one, get-acquainted meeting during late January
- 20 '97?
- A. By the definition of a get-acquainted meeting,
- 22 yeah, I met with all of Liz' directors, and was in and

- 23 around the organization literally shaking the hand of
- 24 every service representative and every manager; in some
- 25 cases, sitting down and having lunch with them just to get 0088
- 1 to know them.
- 2 Q. I may have used different terminology but
- 3 earlier in your testimony, you indicated that, as part of
- 4 your process of getting yourself up to speed in your
- 5 position, you set up one-on-one meetings with the people
- 6 who were reporting to you.
- 7 Referencing that process, did you have any other
- 8 one-on-one meetings other than the ones we have discussed?
- 9 A. No. I have had a one-on-one meeting with
- 10 everybody that reported to me. I had other meetings that
- 11 weren't necessarily one on one with other people in the
- 12 organization.
- 13 Q. Sure. Skipping over to the other meetings, we
- 14 covered your initial meeting in January 16th. During
- 15 the -- I don't want to put testimony in your words, it's
- 16 been a while.
- 17 How long did this process take to get yourself
- 18 up to speed, to the point that you felt capable of making
- 19 decisions about LISC operations?
- 20 A. I guess it depends on the aspect of LISC
- 21 operations, but as I mentioned earlier, I was feeling more
- 22 confident about my intuition and knowledge of what was
- 23 occurring by about the mid-February time frame. And as I
- 24 said earlier, to this day, there are still other case
- 25 situations where I don't feel I am fully up to speed.